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VIA CM/ECF

Honorable Frederic Block  
United States District Court for the  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

*RE: Wexler v. AT&T Corp., No. 15-cv-686 (FB-PK)*

Dear Judge Block:

This letter serves as a response to Defendant's letter requesting a pre-motion conference filed yesterday (Dkt. 36). We disagree with the grounds for the proposed motion for the reasons set forth by this Court in *Bank v. Am. Home Shield Corp.*, No. 10-CV-4014, 2013 WL 789203, (E.D.N.Y. Mar. 2013) (Judge Block). However, we have no objection to AT&T making the motion and ask that the Court waive the requirement for a pre-motion conference and adopt the schedule proposed by AT&T.

Respectfully Submitted,

/s/ Shimshon Wexler